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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JUDITH E. CORBETT,) No. C 04-3671 MEJ
Plaintiff,) **STIPULATION RE: DISCOVERY**
v.) **AND ORDER THEREON**
JOHN POTTER, Postmaster General of the)
United States,)
Defendant.)

Plaintiff Judith E. Corbett (“Plaintiff”), and Defendant John Potter, Postmaster General of the United States (“Defendant”) hereby agree and stipulate as follows:

STIPULATION REGARDING DISCOVERY

1. Although the discovery cutoff is September 9, 2005, the parties stipulate and agree that in order to accommodate the schedules of the parties' counsel and the deponents, the deposition of Kirby

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1 Faciane will proceed on September 19, 2005 at 1:30 at the U.S. Attorneys office on the 10th Floor,
2 450 Golden Gate, San Francisco, CA, and the deposition of Gerald Sanchez will proceed on
3 September 20, 2005 at 1:30 p.m. at 390 Main Street, Suite 740, San Francisco, CA. If necessary,
4 the parties will meet and confer, as required by the court's standing order and the local rules
5 regarding issues about questions asked or objections interposed during those depositions.

6 2. The parties agree that they have met and conferred without success regarding the need to take the
7 deposition of Al Iniguez, which was noticed for September 7, 2005. Pursuant to the Court's
8 standing order regarding discovery issues, the parties have summarized their disputed in the Letter
9 to the Honorable Magistrate Judge Maria Elena James dated September 15, 2005. The parties
10 stipulate and agree that in the event the Court orders the deposition of Al Iniguez to proceed, it will
11 take place at a mutually convenient time and date prior to October 24, 2005 in San Diego, CA.
12 3. Plaintiff's counsel has indicated that she may have concerns regarding Defendant's responses to the
13 plaintiff's interrogatories, request for admissions and request for production of documents.
14 Defendant's counsel is not yet aware of those concerns. Plaintiff's counsel intends to bring any
15 issues that cannot be informally resolved after meeting and conferring with Defendant's counsel to
16 the attention of the Court by way of timely filing a joint letter pursuant to the Court's standing order
17 regarding discovery issues, if necessary.
18 4. The parties will undertake to resolve all pending issues informally, before consuming the resources
19 of the court with time-consuming motions.

20 LAW OFFICES OF MARY DRYOVAGE

21
22 _____/s/
Mary Dryovage
Attorney for Plaintiff
23
24 Dated: September 15, 2005

KEVIN V. RYAN
United States Attorney

25 _____/s/
Julie A. Arbuckle
Assistant United States Attorney
26 Attorneys for Defendant
27 Dated: September 16, 2005

28 PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 20, 2005

MARIA-ELENA
United States Magistrate



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